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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION / PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

Case No.: 4:22-md-03047-YGR

MDL No. 3047

14 This Document Relates To:

15 All Actions
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**JOINT NOTICE OF PLAINTIFFS'
MOTION TO MODIFY THE
PROTECTIVE ORDER**

On May 22, 2023, the Honorable Thomas S. Hixson entered a Protective Order for this litigation. ECF No. 290. On June 5, 2023, Plaintiffs moved the Honorable Yvonne Gonzalez Rogers for relief from Section 7.6 of the Protective Order, which requires the Parties to disclose the identity of, and other information about, their experts and obtain permission from the producing Party before showing such experts documents that Party designated highly confidential. ECF No. 303. At the November 16 Case Management Conference, Judge Gonzalez Rogers directed the Parties to address this motion in the first instance to the Honorable Peter H. Kang, to whom all discovery in this matter is now referred. At the December 14 Discovery Conference, Judge Kang instructed Plaintiffs to withdraw their motion for relief from Section 7.6 of the Protective Order and to refile the relevant documentation as a Motion to Modify the Protective Order. ECF No. 484.

In accordance with Judge Kang's instructions, the Parties hereby attach the following previously filed documents:

- **Exhibit 1:** Plaintiffs' Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure and attached exhibits (ECF No. 303)
- **Exhibit 2:** Defendants Meta, TikTok, and YouTube's Response to Plaintiffs' Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure (ECF No. 318)
- **Exhibit 3:** Plaintiffs' Reply in Support of Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge Regarding Expert Disclosure (ECF No. 321)
- **Exhibit 4:** State Plaintiffs' Position Statement Regarding Protective Order and ESI Protocol (ECF No. 478)

Dated: December 18, 2023

Respectfully submitted,

/s/ Lexi J. Hazam

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ATTESTATION

I hereby attest pursuant to N.D. Cal. Civil L.R. 5–1 that the concurrence to filing of this document has been obtained from each signatory hereto.

DATED: December 18, 2023

By: /s/ Lexi J. Hazam
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